

1 MCGREGOR W. SCOTT
2 United States Attorney
3 WILLIAM S. WONG
4 JASON HITT
5 Assistant U.S. Attorneys
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Sacramento, CA 95814
Telephone (916) 554-2790

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA)
12 Plaintiff,) CR. NO. S-99-433-WBS
13 v.)
14 JOHN THAT LUONG, et al.,) STIPULATION AND ORDER
15 Defendant.) DATE: March 30, 2006
) TIME: 2:00 p.m.
) CTRM: Honorable William B. Shubb

16
17 The United States of America, through its counsels of record,
18 McGregor W. Scott, United States Attorney for the Eastern District
19 of California, and William S. Wong and Jason Hitt, Assistant United
20 States Attorneys; defendant John That Luong, through his counsel,
21 Richard Mazer, Esq.; defendant Son Van Nguyen, through his counsel,
22 James R. Greiner, Esq.; defendant Thongsouk Lattanaphon, through his
23 counsel, Jeffrey Staniels, Assistant Federal Defender; and defendant
24 Hoang Ai Le, through his counsel, Joseph Wiseman, Esq.; stipulate
25 and agree to the following revised motion schedule and exclusion of
26 time under the Speedy Trial Act:

27 1. Government's response to defendants' motions to be
28 filed on March 9, 2006;

2. Defendants' reply, if any, to be filed by March 23, 2006; and
3. Hearing on the motions March 30, 2006, at 2:00 p.m.

Counsel for the government needs additional time to research and prepare its responses to the defendants' motions. Counsel for the government is currently in trial and has been for the last few weeks in the case of United States v. Slater, et al., CR-S-03-0371 MCE. Accordingly, the parties stipulate that time be excluded for the pendency of these motions pursuant to 18 U.S.C. § 3161(h)(1)(F) - delay resulting from any pretrial motion and 18 U.S.C. § 3161(h)(8)(B)(ii) - additional time to adequately prepare for pretrial proceedings.

Respectfully submitted,

McGREGOR W. SCOTT
United States Attorney

DATED: February 6, 2006

By:/s/ William S. Wong

WILLIAM S. WONG

William S. Wong
Assistant U.S. Attorney

DATED: February 6, 2006

By: /s/ Richard Mazer

RICHARD MAZER

John That Luong

DATED: February 7, 2006

By: /s/ James R. Greiner

JAMES R. GREINER

Son Van Nguyen

DATED: February 6, 2006

By: /s/ Jeffrey Staniels

JEFFREY STANTON

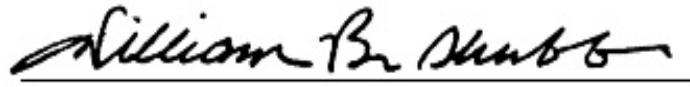
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2
3 DATED: February 6, 2006

By: /s/ Joseph Wiseman
4 JOSEPH WISEMAN for defendant
Hoang Ai Le

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6
7 **ORDER**

8 For the reasons set forth above, the revised law and motion
9 schedule is adopted. Furthermore, time is excluded for the reasons
10 set forth above.

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13 DATED: February 7, 2006

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15 WILLIAM B. SHUBB
16 UNITED STATES DISTRICT JUDGE
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